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April 24, 2025

VIA CM/ECF

The Honorable Christopher J. Burke
United States District Court for the District of
Delaware 844 North King Street
Wilmington, DE 19801

Re: Forsberg et al. v. Shopify, Inc. et al.,
Civ. Action No.: 1:22-cv-00436-GBW-CJB

Dear Judge Burke:

On behalf of Plaintiffs Gregory Forsberg, Christopher Gunter, Samuel Kissinger, and Scott Sipprell (“Plaintiffs”), Defendants Shopify Inc., Shopify Holdings (USA) Inc., Shopify (USA) Inc. (“Shopify Defendants”), and Defendant TaskUs, Inc. (collectively, the “Parties”), undersigned counsel jointly submit this status report pursuant to Your Honor’s March 25, 2025, Oral Order, which directed the Parties to indicate their views as to whether the stay should remain in place. (Doc. 126.)

An agreement in principle to settle all of Plaintiffs’ individual claims has been reached with Defendant TaskUs, Inc. As part of this resolution, all Defendants will be released from Plaintiffs’ claims. The Parties jointly request that the current temporary stay, which is set to expire on April 25, 2025, remain in place for an additional thirty (30) days to allow the agreement to be finalized. The Parties agree that this requested extension will ensure that unnecessary time and resources are not expended on this matter and that this requested extension is in the best interests of fair and efficient litigation. The Parties have conferred and agree that they will not be prejudiced by an additional 30-day stay.

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As such, the Parties agree and request, by and through undersigned counsel and subject to Your Honor's approval, that the temporary stay currently set to expire on April 25, 2025, be extended an additional 30 days.

Respectfully,

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